

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA

SHIRLEY RADABAUGH,

Plaintiff,

- against -

CLAY TURNER REALTY GROUP, LLC

Defendant.

Docket No. 1:20-cv-00058-JRH-BKE

**PLAINTIFF'S MOTION PURSUANT TO  
PROCEED WITHOUT LOCAL COUNSEL**

Plaintiff Shirley Radabaugh ("Plaintiff"), via undersigned counsel, respectfully moves the Honorable Court for leave to file its pro hac vice application proceed in this action *without* local counsel. This matter involves a simple copyright infringement claim under 17 U.S.C. § 501 arising from defendant's unauthorized use of a single photograph. Plaintiff's counsel, Richard P. Liebowitz, is located in New York and serves as lead counsel. The grounds for the requested relief are as follows:

- 1) This is not a complex matter and involves a single cause of action.
- 2) The requirement to retain local counsel imposes additional costs on Plaintiff that is not warranted by the overall economic value of the case. Accordingly, as a valuable cost-saving measure, Plaintiff respectfully requests that Mr. Liebowitz be permitted to file his pro hac vice application without local counsel.

Dated: May 6, 2020

Respectfully Submitted,

/s/Richard Liebowitz  
Richard Liebowitz

*Counsel for Plaintiff*  
*Shirley Radabuagh*